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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

In Re:	§	
Shane Daniel Davis	§	Case No. 09-70589-HDH-13
Cori Rae Davis	§	Chapter 13
Debtors	§	

DEBTORS' MOTION TO EXTEND AUTOMATIC STAY

Comes Now Debtors, by counsel, and for this Motion state as follows:

1. Debtors filed for relief under Chapter 13 in the Northern District of Texas. This is a core proceeding.
2. Debtors were as a debtor in a prior case during the preceding year. To-wit: Chapter 13, Case No. 07-70524-HDH-13 filed on 12/13/2007.
3. Debtors seek an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
4. Debtors' prior case was dismissed for: Debtor was laid off on 1/4/2009 and the Trustee payments were being deducted from his pay check. He did not begin receiving unemployment benefits until 3/3/2009. He is currently working for Ben E. Keith Co., and continues receiving unemployment.
5. The following changes of circumstances demonstrate that the Debtors can perform this plan and are likely to complete the case successfully: Debtors' are both employed and will have the Trustee payments deducted from Joint Debtor's pay check.

WHEREFORE, Debtors' request this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted,

/s/Monte J. White
Attorney for Debtors

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on November 24, 2009, on all parties on the mailing matrix:

/s/Monte J. White
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